September 2016 ACA Training Outline and Report Process Steps

ACA Regional Training

UW-Eau Claire - 9/19/2016
UW-Oshkosh – 9/20/2016
UW-Milwaukee – 9/21/2016

ACA Resources:

- FAQ’s, Procedures, Measurement and Stability Period Illustration and Hours Worked per Month Illustration.
  Employee facing website: [https://www.wisconsin.edu/ohrwd/aca/](https://www.wisconsin.edu/ohrwd/aca/)
  Administrator website: [https://www.wisconsin.edu/ohrwd/aca-admin/](https://www.wisconsin.edu/ohrwd/aca-admin/)

General Overview of Topics:

- 3 categories (Buckets) of employees for ACA (UW has many categories of employees that need to fit into the 3 categories)
  - Full-time
    - >= 30 hours/week for more than 90 days, 1,560 hours per measurement period (year)
    - Have to offer health care that is affordable and minimum value or risk a potential penalty.
    - Offer coverage the 1st of 4th month or pay a penalty
    - Set FTE
  - Part-time
    - <=29 hours/week
    - Don’t have to offer health care, no penalty.
    - Set schedule, set FTE
  - Variable
    - No set schedule/hours, no set FTE
    - < 90 days of employment, <1,560 hours/year, keep employee under 1,560 in a rolling 12 months for both variable and seasonal employment
      - Seasonal
        - Specific duration (less than 6 months)
        - Seasonality - tied to a season-meaning it can only be tied to activities in that season.

- ACA Hours of Service for tracking/reporting and determining employee “bucket”.
  - Hours worked
    - Each hour for which the employee is paid or entitled to payment “for the performance of duties”
  - Paid Time off
    - Each hour for which the employee is paid or entitled, due to vacation, holiday, illness, incapacity, layoff, jury duty, military duty or leave of absence.
  - On Call
    - When an employee is expected to respond to a call at a particular location (specific geographical point) within a timeframe of 15 minutes or less from the call, any hours holding the phone or being on-call would be tracked for purposes of the ACA.
• Who does not get health care benefits at UW System? (These are the biggest risk groups that could cause us to get penalties if they are not managed.)
  o Never get health care benefits
    ▪ Student help
  o Sometimes get health care benefits, sometimes do not
    ▪ Craft workers
    ▪ University Staff Temp
    ▪ University Staff Project
    ▪ Lump Sums
    ▪ Rehired Annuitants

• Measurement/Stability Periods
  o Initial Measurement Period (determines status in next reporting period). Only have to put employees in the initial measurement period if we don’t offer affordable coverage (student hourly-always, crafter workers, university staff temp, university staff project, lump sums, rehired annuitants-sometimes, varies by employee situation for these groups of employees).
    ▪ 1st of month following date of hire and includes next 12 months
      • Example – Student worker - employee works 2,000 hours during the year = full-time – employer has to offer coverage or pay a penalty. Since UW System doesn’t offer coverage to students only option is a penalty – leads to 95% coverage level to eligible employees.
      • Full-time or not-full-time
        o Measure hours for first 12 months of employment – starts first of month following date of hire – determines/confirms they are either full-time or part-time
  o Standard Measurement Period (determines status for existing employees for next reporting period). Employees offered affordable coverage automatically put in standard measurement period.
    ▪ Employee can be measured in both Initial and Standard when they are a new employee (concurrently). If they are full-time in one and part-time in another they are considered full-time for reporting for that reporting period. Full-time always trumps.
    ▪ November 1 – October 31 (12 months)
  o Stability Period
    ▪ Not a set date because
    ▪ Only happens after Initial or Standard Measurement Period
    ▪ January 1 – December 31 (12 months)

• Breaks in Employments
  o If an employ has a break in service that is longer than 26 weeks (6 months) their measurement period starts over. See Administrator procedures and FAQ for more information.

• Penalties
  o Big Penalty (avoid penalty)
    ▪ Have to offer coverage to 95% of full-time employees
      • If employers don’t offer coverage to 95% of full-time employees there are huge penalties – UW System could be $67 million
      • # covered / # of full-time employees = % covered
        o Can be calculated each month
      • 5% is about 1,500 employees
Smaller Penalty (mitigate penalties)
  - Full-time employee, goes to federal marketplace, gets a subsidy
    - Penalty is $2,000 to employer
  - IRS is going to start to send out penalties in November.
  - UW System hasn’t determined yet who will be paying the penalties.

Report Monitoring and Review for ACA

- Reports
  - Missing ACAHW Hours (UW_ACAHWREQ) - Lump sum payments with no ACAHW hours reported where Days-Worked Equivalency method is being used
  - Unmatched ACAHW Hours (UW_ACAHWNUSE) - Time that has been entered in Time & Labor using ACAHW time reporting code with no corresponding lump sum payment
  - ACA Hours Report (UW_ACAHRSRPT) - Summary report showing all hours (regular, work study, ACAHW, and Days-Worked Equivalency)
  - ACA Full-Time Trending Report (UW_ACA_TREND) - Identify borderline full-time eligible and full-time eligible employees whose current total hours and their expected hours are equal to or greater than 120 hours
  - Not Affordable Full-Time Employees (UW_ACANAFTRP) - Employees by month that were ACA full time and not offered coverage or the coverage was not affordable
  - Measurement Period Report (UW_ACA_MPRPT) – Best run for a single employee only. Does not break down by campus

Here the KB on how to run reports: https://kb.wisc.edu/hrs/page.php?id=65060

- Report Review Process
  1. ACA Full-Time Trending Report – Pro-active Report
     - Remove all Eligible for insurance (filter on “Currently Offered” column and remove the “Ys”
     - Review/Remove affordable column
     - Sort “Months Remaining” from low to high for hours so you can look at the ones that have the least amount of time to make changes to their hours.
     - Groups of employees by risk (Months (# of months left to measure))
       - Review Trend Status – be proactive with employees trending high
     - Fix lump sums (add hours worked instead of using days worked equivalency)
     - Sort by Employee Class
       - SH (Student Help)
         - Lump sums
           - Fix lump sums – add hours.
           - Do we have ACAHW hours entered to match the lump sums?
             - Do they have multiple jobs?
             - Do their hours need to be limited to bring their average down?
             - Are they resident assistants?
               - How to limit hours if not full-time
               - Talk to housing – make pro-active changes for 2017
       - University Staff-Temp (formerly LTE)
         - Check FT/PT Flag – is it correct?
         - If they are averaging more than 130 hours per month - look at future needs – has there been an established need to change this employee to a FTE?
         - Are they WRS eligible (eligible class, expectation change)?
  2. Not Affordable Full-Time Employees – Pro-active Report
- Who is a Rehired Annuitant? = Have them complete the Rehired Annuitant Election Form (annually needs to be completed during Annual Benefits Enrollment).
- Other employee Class – Pro-active tool
  - Problem solve
    - Check if part-time or full-time rate correct
  - Call Dept
- HR needs to fix Health Rate on the position (Job Data tab > UW Benefits tab) (should be entered when the position was created)

   - Monthly report (ran the 2nd weekend of each of each month)

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5. ACA Hours Report – Research & Monitor Report
   - Monthly report (ran the 2nd weekend of each month)

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